

JENNIFER BERGH

jbergh@qslwm.com

Nevada Bar No. 14480

QUILLING SELANDER LOWNDS

WINSLETT & MOSER, P.C.

2001 Bryan St., Suite 1800

Dallas, TX 75201

(214) 560-5460

(214) 871-2111 Fax

Counsel for Trans Union LLC

****Designated Attorney for Personal Service****

Trevor Waite, Esq.

Nevada Bar No.: 13779

6605 Grand Montecito Parkway, Suite 200

Las Vegas, NV 89149

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

DIAHANN POZOS-MALETTA,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, TRANSUNION, LLC, WESTERN
FEDERAL CREDIT UNIONS and
NORDSTROM/TD BANK USA,

Defendants.

Case No. 2:20-cv-00242-JCM-NJK

**DEFENDANT TRANS UNION LLC'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO REPLY TO
PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO DISMISS**

Defendant Trans Union LLC ("Trans Union"), by counsel, files its Unopposed Motion for Extension of Time to Reply to Plaintiff's Response to Defendant's Motion to Dismiss and would respectfully show the Court as follows:

I. BACKGROUND

1. On February 4, 2020, Plaintiff Diahann Pozos-Maletta ("Plaintiff") filed an original complaint ("Complaint"). In response, Trans Union filed its Motion to Dismiss Plaintiff's Complaint, Dkt. 5.

2. Plaintiff then filed a Response in Opposition to Trans Union LLC's Motion to Dismiss Complaint on March 30, 2020, Dkt 22. Trans Union's deadline to reply to Plaintiff's Response is April 6, 2020.

II. RELIEF REQUESTED

1 3. Trans Union seeks a 14-day extension of the deadline to file its Reply to
2 Plaintiff's Response.

3 4. Good cause exists for Defendant's extension as Trans Union needs additional
4 time to review the numerous arguments made in Plaintiff's 11-page Response, to review the case
5 law cited therein, and to prepare its Reply.

6 5. Plaintiff is not opposed to the requested extension and no party will be prejudiced
7 thereby. The extension is not requested for delay and will not impact any other deadline in the
8 Court's Scheduling Order.

9 Wherefore, Trans Union respectfully requests this Court issue an Order extending the
10 deadline for Trans Union to file its Reply to Plaintiff's Response to April 20, 2020.

11 Dated this 6th day of April 2020.

12 /s/ Shawn W. Miller

13 **SHAWN W. MILLER**

14 smiller@kriegerlawgroup.com

15 **DAVID H. KRIEGER**

16 dkrieger@hainesandkrieger.com

KRIEGER LAW GROUP, LLC

2850 W. Horizon Ridge Pkwy., Suite 200

Henderson, NV 89052

(702) 848-3855

Counsel for Plaintiff

/s/ Jennifer Bergh

JENNIFER BERGH

jbergh@qslwm.com

Nevada Bar No. 14480

QUILLING SELANDER LOWNDS

WINSLETT & MOSER, P.C.

2001 Bryan St., Suite 1800

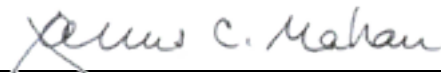
Dallas, TX 75201

(214) 560-5460

(214) 871-2111 Fax

Counsel for Trans Union LLC

IT IS SO ORDERED April 8, 2020.

21 
22 **UNITED STATES DISTRICT JUDGE**

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April 2020, I electronically filed **DEFENDANT TRANS UNION LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS** with the Clerk of the Court using the CM/ECF system which will then send a notification of such to the following counsel of record:

Shawn W. Miller
smiller@kriegerlawgroup.com
David H. Krieger
dkrieger@hainesandkrieger.com
Krieger Law Group, LLC
2850 W. Horizon Ridge Pkwy., Suite 200
Henderson, NV 89052
(702) 848-3855
Counsel for Plaintiff

Brett P. Ryan
Brett.Ryan@UnifyFCU.com
7935 W. Sahara Ave., Suite 201
Las Vegas, NV 89117
(310) 783-5957
Counsel for Western Federal Credit Union

Jeremy J. Thompson
jthompson@clarkhill.com
Clark Hill PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
(702) 862-8300
(702) 862-8400 Fax
Counsel for Equifax Information Services, LLC

Tyson E Hafen
tehafen@duanemorris.com
Duane Morris LLP
100 North City Pkwy., Suite 1560
Las Vegas, NV 89106
(702) 868-2655
(702) 385-6862 Fax
Counsel for Nordstrom and TD Bank USA

/s/ Jennifer Bergh
JENNIFER BERGH